

THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

JOHNNY O'BRYANT

PLAINTIFF

V.

CIVIL ACTION NO. 1:07cv477 LG-RHW

HARRISON COUNTY ADULT  
DETENTION CENTER, HARRISON  
COUNTY, MISSISSIPPI, SHERIFF GEORGE  
PAYNE, JR., WARDEN DONALD A.  
CABANA, CHAPLAIN JOE COLLINS,  
RHONDALYN ROGERS, FORMER DEPUTY  
KARL STOLZE, AND FORMER DEPUTY  
RICK GASTON

DEFENDANTS

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**FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO  
PLAINTIFF BY DEFENDANTS, SHERIFF GEORGE PAYNE, JR., WARDEN DONALD A.  
CABANA, RHONDALYN ROGERS AND CHAPLAIN JOE COLLINS**

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COME NOW Defendants, George Payne, Jr., individually and in his official capacity as Sheriff of Harrison County, Mississippi, Warden Donald A. Cabana, in his official and individual capacity, Rhondalyn Rogers, in her official and individual capacity, and Chaplain Joe Collins (herein referred to collectively as the "Defendants") by and through their counsel of record, Dukes, Dukes, Keating and Faneca, P.A., by way of Requests for Production of Documents in accordance with the Federal Rules of Civil Procedure, and does hereby propound the following discovery unto the Plaintiff, Johnny O'Bryant, and requests that same be answered in the manner prescribed by law.

In the following Request for Production of Documents:

"You" and "your" means Plaintiff and all representatives, attorneys and other parties acting on behalf of the Plaintiff.

"Document" means any written, recorded or graphic matter however produced or reproduced.

These Requests for Production of Documents shall be deemed continuing so as to require

supplemental answers if you obtain further information between the time responses are served and the trial of this matter.

**REQUEST NO. 1:** Please produce a copy of any and all documents, photographs, video tapes and/or other demonstrative evidence which you will or may offer as evidence at the trial of this cause.

**REQUEST NO. 2:** Please produce copies of any and all documents identified by you in either your Complaint, Amended Complaints, or in your responses to Interrogatories or other written discovery requests.

**REQUEST NO. 3:** Please produce copies of any and all documents, etc., containing any information relevant to the issues raised in this case.

**REQUEST NO. 4:** Please produce copies of the reports of all expert witnesses you propose to use at the trial of this cause.

**REQUEST NO. 5:** Please furnish reports of all expert consultants you have retained or employed to assist you in preparing this case for trial.

**REQUEST NO. 6:** Please produce a copy of the curriculum vitae of all expert witnesses you propose to use at the trial of this cause.

**REQUEST NO. 7:** For each expert witness identified by you, please produce a copy of every document or tangible thing relied upon by each such expert in the formulation of his opinions, to include a copy of each such expert's file regarding this matter.

**REQUEST NO. 8:** Please furnish a detailed itemization of all damages which you claim to have sustained as a result of the conduct of the Defendants herein.

**REQUEST NO. 9:** Please produce copies of all grievances and inmate requests filed by you while incarcerated in the Harrison County Adult Detention Center.

**REQUEST NO. 10:** Please produce copies of any and all letters or other correspondence that you sent to Defendants Payne, Cabana, Rogers or Collins.

**REQUEST NO. 11:** Please produce a copy of all hospital records, clinical records, outpatient records, x-rays, nursing notes and other such records/reports prepared in connection with any and all treatment that you received for any alleged injuries stated in your Complaint, Amended Complaints and other pleadings.

**REQUEST NO. 12:** Please produce copies of any and all reports or statements, signed or otherwise, given or made by you concerning this lawsuit, or concerning any of your allegations which are the subject of this lawsuit.

**REQUEST NO. 13:** Please produce any and all copies of incident reports or reports of an investigation which you may have in your possession which described or investigated the incident alleged in your Complaint, Amended Complaint or other pleadings.

THIS the 2<sup>nd</sup> day of November, 2007.

Respectfully submitted,

**SHERIFF GEORGE PAYNE, JR., WARDEN  
DONALD A. CABANA, RHONDALYN ROGERS  
and CHAPLAIN JOE COLLINS, Defendants**

By and Through Their Attorneys,  
**DUKES, DUKES, KEATING & FANECA, P.A.**

By: s/David N. Duhé  
Cy Faneca, Mississippi Bar No. 5128  
David N. Duhé, Mississippi Bar No. 102047

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dduhe@ddkf.com

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I have filed a true and correct copy of the above and foregoing pleading using the Court's ECF system and notification will automatically be provided to the following:

Karen Young, Esq.  
Meadows Riley Law Firm  
Post Office Box 1076  
Gulfport, Mississippi 39502

I further certify that I have mailed a true and correct copy of the above and foregoing via United States mail, first class, postage fully prepaid to the following:

Johnny O'Bryant, #289746  
Harrison County Adult Detention Center  
B-B  
10451 Larkin Smith Drive  
Gulfport, Mississippi 39503

SO CERTIFIED, this the 2<sup>nd</sup> day of November, 2007.

s/David N. Duhé  
David N. Duhé